

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SONTERRA CAPITAL MASTER FUND LTD.,
FRONTPOINT EUROPEAN FUND, L.P., FRONTPOINT
FINANCIAL SERVICES FUND, L.P., FRONTPOINT
HEALTHCARE FLAGSHIP ENHANCED FUND, L.P.,
FRONTPOINT HEALTHCARE FLAGSHIP FUND, L.P.,
FRONTPOINT HEALTHCARE HORIZONS FUND, L.P.
FRONTPOINT FINANCIAL HORIZONS FUND, L.P.,
FRONTPOINT UTILITY AND ENERGY FUND L.P.,
HUNTER GLOBAL INVESTORS FUND I, L.P.,
HUNTER GLOBAL INVESTORS FUND II, L.P.,
HUNTER GLOBAL INVESTORS OFFSHORE FUND
LTD., HUNTER GLOBAL INVESTORS OFFSHORE
FUND II LTD., HUNTER GLOBAL INVESTORS SRI
FUND LTD., HG HOLDING LTD., HG HOLDINGS II
LTD., and FRANK DIVITTO, on behalf of themselves and
all others similarly situated ,

Plaintiffs,

- against -

CREDIT SUISSE GROUP AG, CREDIT SUISSE AG,
JPMORGAN CHASE & CO., THE ROYAL BANK OF
SCOTLAND PLC, UBS AG, BLUECREST CAPITAL
MANAGEMENT LLP, DEUTSCHE BANK AG, DB
GROUP SERVICES UK LIMITED, and JOHN DOE
NOS. 1-50,

Defendants.

No. 15-cv-00871 (SHS)

ORAL ARGUMENT REQUESTED

**NOTICE OF DEFENDANTS' MOTIONS TO
DISMISS THE AMENDED CLASS ACTION COMPLAINT**

PLEASE TAKE NOTICE that the undersigned, attorneys for Defendants Credit Suisse Group AG, Credit Suisse AG, JPMorgan Chase & Co., The Royal Bank of Scotland plc, UBS AG, Deutsche Bank AG, and DB Group Services UK Limited (collectively, "Bank Defendants"), in the above referenced matter, will move this Court, before the Honorable Sidney H. Stein,

United States District Judge for the Southern District of New York, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by this Court, for an order pursuant to Rules 12(b)(1), 12(b)(2), and 12(b)(6) of the Federal Rules of Civil Procedure dismissing with prejudice the Amended Class Action Complaint in the above-captioned action.

The grounds for these motions are that the Amended Complaint should be dismissed for lack of personal jurisdiction as to Credit Suisse Group AG, Credit Suisse AG, The Royal Bank of Scotland plc, UBS AG, Deutsche Bank AG, and DB Group Services UK Limited, and because, as to all Bank Defendants, it fails to state a claim upon which relief can be granted and the Court lacks subject matter jurisdiction over the claims asserted. The specific grounds are set forth in two memoranda: (1) the Memorandum of Law in Support of Defendants' Motion to Dismiss for Failure to State a Claim and For Lack of Subject Matter Jurisdiction and the accompanying Declaration of Peter Sullivan dated August 18, 2015 and exhibits thereto; and (2) the Memorandum of Law in Support of Defendants' Motion to Dismiss the Amended Complaint for Lack of Personal Jurisdiction and the accompanying Declarations of Daniel Klaey, Jennifer Lobato-Church, Richard Mumford, Allison Cambria, Joseph Randazzo, Caroline Ifrah, and Joanne Bagshaw.

Dated: New York, New York
August 18, 2015

RESPECTFULLY SUBMITTED,

/s/ Peter Sullivan

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Lawrence J. Zweifach

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